

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

=====X  
RADAR SPORTS MANAGEMENT, LLC

Plaintiff,

**COMPLAINT**

-against-

LEGACY LACROSSE, LI INC, MADLAX INC  
dba MADLAX EVENTS, TRUE LACROSSE,  
INDIVIDUALLY AND DOING BUSINESS  
COLLECTIVELY AS CLUB NATIONAL

Defendants,

-and-

MICHAEL BRENNAN, TRACEY CANTABENE,  
THOMAS ZUMMO, MIKE GABEL, CABEL  
MADDUX, and JAKE DEAN,

Defendants,

=====X

**NATURE OF THE ACTION**

1. Defendants collectively operating as a partnership, joint venture or consortium under the trade name CLUB NATIONAL and style CLUB NATIONAL solicit the publicly to join in a public sporting event known as CLUB NATIONAL.
2. The CLUB NATIONAL provides to teams which contract with them use of public parks, hotel accommodations and discounted tickets at public attractions.
3. On or about May 3, 2021, the defendants acting collectively as the CLUB NATIONAL entered into a contract with the plaintiff.
4. The defendants acting collectively as the CLUB NATIONAL breached said contract.

5. Defendants acting collectively as CLUB NATIONAL repudiated said contract on or about September 20, 2021.
6. The purpose of defendants acting collectively was to discriminate against young men of the black race who enroll in RADAR SPORTS MANAGEMENT LLC seek to play lacrosse.
7. This accordingly is an action to recover damages for breach of contract and violation participants of plaintiffs in programs to be free of unlawful discrimination.
8. Accordingly, Plaintiff seeks an order from this Court requiring Defendants to restore Plaintiff to participation in the CLUB NATIONAL TOURNAMENT and to take affirmation steps to remove artificial barriers to minority participation in the sport of lacrosse requiring CLUB NATIONAL to modify its practices, policies, and procedures to comply with the public accommodations law. Plaintiff further seeks compensatory and exemplary damages, as well as costs, attorneys' fees, and such other relief for breach of contract as this Court deems just and proper.
9. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331 and §1343 because Plaintiff asserts claims under Federal Law to wit 42 USC 2000-a.

#### **JURISDICTION AND VENUE**

10. This Court has jurisdiction over the non-federal claims of breach of contract as such claim is between citizens of different states. The Court has jurisdiction pendent to its jurisdiction over a federal claim. (28 USC 1367)
11. The Court has jurisdiction over non-federal claims pursuant to 13 USC 1322 for diversity of citizenship as defendants are citizens of different states from that of the plaintiff.
12. The Court has personal jurisdiction of Defendants pursuant to 28 U.S.C. §1391 because Defendants, collectively participate in CLUB NATIONAL, one member of which, LEGACY LACROSSE, LI INC does business in the Eastern District of New York and because Plaintiff's claims for relief arise

from Defendants' transaction of business in the Eastern District of New York.

13. Venue is proper in this judicial district pursuant to 28 U.S.C. §1391 because the acts of Defendants which give rise to this action occurred in the Eastern District of New York.
14. RADAR SPORTS MANAGEMENT, LLC., hereinafter RADAR operates youth lacrosse teams of diverse composition to play in competitive games created and devoted to promoting minority participation in youth sports.
15. RADAR is an LLC organized under the law of Pennsylvania with its principal place of business at 300 Peninsula Dr., Carolina Beach, NC 28428.
16. MADLAX INC dba MADLAX events hereinafter MADLAX is a corporation organized under the laws of the State of Virginia with its principal place of business at 1345 Chain Bridge Rd McClean VA 22102.
17. TRUE LACROSSE is a business organization with its principal place of business organization with its principal place of business located at 131 North Eisenhower Lane, Lombard, IL 60148.
18. LEGACY LACROSSE LI, INC is a corporation organized under the laws of New York with its principal place of business at 850 Karshick St, Bohemia, NY 11716.
19. MIKE GABEL is an individual residing at 676 Evcild Ave, Glen Ellyn, IL 60137.
20. THOMAS ZUMMO is an individual residing at 850 Karshick St Bohemia, NY 11716.
21. MICHAEL BRENNAN is an individual residing at 850 Karshick St Bohemia, NY 11716.
22. CABEL MADDUX is an individual residing at 1345 Chain Bridge Road, McClain, VA 22122.
23. JAKE DEAN is an individual residing at 131 N. Eisenhower La, Lombard, IL 60148.



24. TRACEY CANTABENE is an individual residing at 7501 Pinewild Road, Seven Valley, PA 17100

25. Defendants collectively partner up as CLUB NATIONAL which operates collectively as a partnership, joint venture, or consortium.

26. CLUB NATIONAL sponsors a tournament, a public event in youth lacrosse conducted in public parks, providing discounted hotel accommodations and public attraction tickets.

### **COUNT I: BREACH OF CONTRACT**

27. Plaintiff reiterates all previous allegations of the complaint.

28. On or about May 3, 2021, Plaintiff entered into an electronic contract with defendants.

29. The purpose of the Plaintiff was to field a team in a public event organized by Defendants in a sporting arena, stadium and place of exhibition in a public facility known as Austin-Tindall Sports Complex in the city of Kismee, Florida.

30. It is the customary business of defendants to present the performance and public exhibitions of athletic teams in public parks.

31. The operations of defendants in scheduling a competitive travel lacrosse team have an impact on interstate commerce, involving reservations through defendants of space in a hotel and use of airbus and other instrumentalities of interstate commerce.

32. On or about September 20, 2021 Defendants repudiated the contract they had made with Plaintiff.

33. The Defendants willfully and maliciously breached their contract with the Plaintiff.

34. Defendants acted out of discrimination animus.

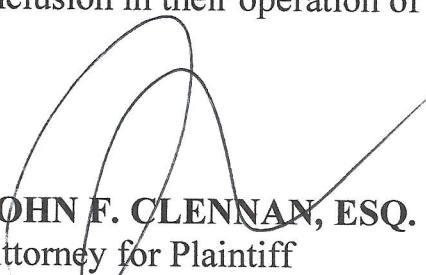
### **COUNT II: VIOLATION OF PUBLIC ACCOMDATION LAW**

35. Plaintiff reiterated all previous allegations of the complaint.
36. Plaintiff is a 100% minority owned business.
37. Its players are a diverse and inclusive group consisting of a high proportion of minority players enumerating 25% of the players.
38. Its coaches likewise are a diverse and inclusive group consisting of 50% minority group members.
39. The Plaintiff was excluded from the tournament because Defendants are afraid of minority intrusion on a white dominated sport in violates the Public Accommodations Law.

**WHEREFORE** Plaintiff demand judgment on Count I for damages in the amount of Five Million Dollars (\$5,000,000) and specific performance of the contract on Count II for the following:

- (a) For damages in the amount of Twenty Five Million Dollars (\$25,000,000);
- (b) Specific performance on the Contract
- (c) Exemplary damages in the amount of Five Million Dollars (\$5,000,000);
- (d) Counsel Fees; and
- (e) Directing Defendants to form an affirmative plan for increase diversity and inclusion in their operation of youth lacrosse.

Dated: October 1, 2021  
Ronkonkoma, NY



**JOHN F. CLENNAN, ESQ.**  
Attorney for Plaintiff  
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Ronkonkoma, NY 11779  
631-588-6244

TO: RADAR SPORTS MANAGEMENT, LLC  
300 Peninula Drive  
Carolina Beach, NC 28428

LEGACY LACROSSE, LI INC, 850 Karshick St  
Bohemia, NY 11716

MADLAX INC dba MADLAX EVENTS  
1345 Chain Bridge Rd  
McClean, VA 22102

TRUE LACROSSE  
131 N. Eisenhower Lane  
Lombard, IL 60148

MICHAEL BRENNAN  
850 Karshick St  
Bohemia, NY 11716

THOMAS ZUMMO  
850 Karshick  
St Bohemia, NY 11716.

MIKE GABEL  
676 Evllid Ave  
Glen Ellyn, IL 60137

CABEL MADDUX  
1345 Chain Bridge Rd  
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JAKE DEAN  
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TRACEY CANTABENE  
7501 Pinewild Rd  
Seven Valley, PA 17100

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EASTERN DISTRICT OF NEW YORK

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COMPLAINT

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Attorney for Petitioner

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